

**PAUL MONTLEONI, ESQ.
ATTORNEY AT LAW
816 DEER PARK AVENUE
NORTH BABYLON, NEW YORK 11703
(631) 422-2900**

Via ECF

April 20, 2021

Hon. Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

*Re: United States v. John Nugent
20-CR-00645 (PAE)*

Dear Judge Engelmayer:

I represent John Nugent, a defendant in the above case, and write seeking an order from the Court amending certain conditions of Mr. Nugent's bail.

At the arraignment, before Magistrate Judge Parker, on December 3, 2020, the Court, inter alia, imposed the following condition, a \$100,000 unsecured personal recognizance bond. The bond was signed by both Mr. Nugent and his wife, Coleen Nugent.

In that regard, Mr. Nugent wishes to sell his home in Rocky Point, New York, and purchase a new home in Spring Hill, Florida. The home in Rocky Point is currently in contract for \$440,000 and has equity of approximately \$270,000. The house in Spring Hill, Florida, has an equity value of approximately \$250,000. In addition to his home in Rocky Point, Mr. Nugent owns a home in Kortright, New York, worth approximately \$136,000. Kristina Kotyza, a paralegal at the United States Attorney's Office, informed my client's wife, Coleen, the co-surety property owner, that as long as the Nugents maintain \$100,000 in assets at all times the United States Attorney's Office will not object to this application. Paul Monteleoni, the Assistant United States Attorney assigned to this matter, consents to the within application.

Additionally, if the Court grants the within application to modify the bail conditions, Mr. Nugent seeks to relocate to Florida. He has spoken to his U.S. Pretrial Services Officer, Marnie Gerardino, and was advised that if the application is granted, he would be assigned a pretrial officer in Florida to handle his case.

Accordingly, it is respectfully requested that defendant John Nugent's bail conditions be modified, and that he be allowed to sell his current home in Rocky Point, New York, purchase a new home in Spring Hill, Florida, and subsequently relocate to Florida.

Respectfully submitted,

s/

William D. Wexler

WDW/cm

cc: AUSA Paul Monteleoni
U.S. Pretrial Services Officer Marnie Gerardino

GRANTED. The Clerk of Court is requested to terminate the motion at Dkt. No. 55

4/20/2021

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge